

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:	§	Filed: December 11, 2003
Dettinger et al.	§	
	§	Group Art Unit: 2165
Serial No.: 10/733,973	§	
	§	Examiner: Tomasz Ponikiewski
Confirmation No.: 1355	§	

For: REUSING INTERMEDIATE WORKFLOW RESULTS IN SUCCESSIVE
WORKFLOW RUNS

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

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December 3, 2007
Date

/Jon K. Stewart/
Jon K. Stewart

REPLY BRIEF

Dear Sir:

Applicants submit this Reply Brief to the Board of Patent Appeals and Interferences in response to Examiner's Answer mailed on October 3, 2007. While Applicants' maintain each of the arguments submitted in Applicants' previously submitted Appeal Brief, Applicants make the following further arguments in light of the Examiner's Answer.

ARGUMENTS

***Li* Does Not Anticipate Claims 1, 10, 15, or 35 under 35 U.S.C. § 102(e)**

The Examiner continues to argue that *Li* discloses “a method of execution of a multi-step workflow that is repeatedly executed on data of a database, wherein the workflow is defined by a plurality of steps, each step being an executable function that operates on input from a previous step and produces output for a subsequent step and each step having a defined input format and output format.” And in particular the Examiner argues that *Li* teaches a method that includes “determining whether the step is deterministic, in that the step generates identical output for given input in repeated executions of the step on the relevant data,” as recited by claim 1. Claims 10, 15, and 35 each recite a similar limitation. For example, claims 10 and 35 recite a step of “identifying the step as deterministic, in that the step generates identical output for given input in repeated executions of the step on the relevant data,” and Claim 15 recites the same limitation as claim 1. Similarly, claim 24 recites determining whether a workflow step is a deterministic step; namely, that “the step generates identical output for given input in repeated executions of the step on the relevant data.”

As demonstrated in Applicants’ Appeal Brief, *Li* does not teach these limitations. In response to the arguments presented therein, the Examiner suggests:

Li teaches, in column 7, lines 53-61, that a timestamp may be useful to analyze web sites. *Li* also teaches storing results of a request in a cache. The result is retrieved for subsequent request without repeating the search unless a data change is detected which could invalidate the saved data in the cache. When the change is detected the search is performed to update the result.

Examiner’s Answer, p. 22. Respectfully, the material cited by the Examiner describes that results may be stored in a cache and in some cases cache entries may be invalidated. However, nothing in the material cited by the Examiner describes the claimed limitation of “determining whether [a step of the workflow on relevant data of the database] is deterministic, in that the step generates identical output for given input in repeated executions of the step on the relevant data,” as recited by claim 1. That is, nothing in this material discloses evaluating a workflow step used to process relevant

data to determine whether the workflow step is (or is not) deterministic. Instead, the material discloses that dynamic web pages may be stored in a cache, and in some cases, invalidated.

For these reasons, and the reasons stated in Applicants' Appeal brief, Applicants submit that *Li* does not anticipate independent claims 1, 10, 15, 24, or 35, or dependent claims 2-9, 11-12, or 16-23. Accordingly, Applicants respectfully request that the Board vacate the rejection of these claims and direct the Examiner to allow these claims.

Claims 29 and 32 are not obvious over *Li* in view of *Crisan* under 35 U.S.C. § 103

Claim 29 is directed to a computer system that includes “a workflow execution manager residing in memory for managing execution of a multi-step workflow that is repeatedly executed on the data of the database, wherein the workflow is defined by a plurality of steps, each step being an executable function that operates on input from a previous step and produces output for a subsequent step and each step having a defined input format and output format.” Claim 29 specifies that the workflow execution manager is configured for “receiving current input to a step of the workflow on relevant data of the database, wherein the step has been previously executed on the relevant data using previous input identical to the current input and wherein the previous execution of the step produced previous output,” and “determining whether the step is deterministic, in that the step generates identical output for given input in repeated executions of the step on the relevant data.” Claim 32 recites a similar limitation, specifically, “determining whether the at least one functional module is deterministic, in that the at least one functional module generates identical output for given input in repeated executions of the at least one functional module.”

As demonstrated in Applicants' Appeal Brief, *Li* does not teach these limitations. Specifically, *Li* does not teach receiving current input to a step of the workflow on relevant data of the database, wherein the step has been previously executed on the relevant data using previous input identical to the current input and wherein the previous execution of the step produced previous output” as established above with respect to the 102(e) rejection. Further, *Li* does not teach the recited step of determining whether

the step is deterministic, in that the step generates identical output for given input in repeated executions of the step on the relevant data, as established above.

For these reasons, and the reasons stated in Applicants' Appeal brief, Applicants submit that *Li* in view of *Crisan* does not render independent claims 29 or 32, or dependent claims 33, 34 obvious. Accordingly, Applicants respectfully request that the Board vacate the rejection of these claims and direct the Examiner to allow these claims.

Claim 30 Is Not Obvious under 35 U.S.C. § 103(a) over *Li* in view of *Crisan*

As demonstrated in Applicants' Appeal Brief, *Li* in view of *Crisan* does not disclose a computer system that includes "a workflow execution manager residing in memory for managing execution of a workflow that is repeatedly executed on the data of the database, wherein the workflow is defined by a plurality of steps, each step being an executable function that operates on input from a previous step and produces output for a subsequent step and each step having a defined input format and output format." Further, Applicants' Appeal Brief demonstrates that *Li* in view of *Crissan* does not disclose a workflow execution manager configured for receiving current input to a step of the workflow on relevant data of the database, wherein the step generates identical output for given input in repeated executions of the step on the relevant data. Like claim 24, discussed above, Claim 30 recites determining whether a workflow step is a deterministic step; namely, that "the step generates identical output for given input in repeated executions of the step on the relevant data." For all the reasons stated above, therefore, *Li* in view of *Crisan* does not disclose a system with a workflow manager configured for performing this step.

For all the reasons stated above, therefore, and the reasons stated in Applicants' Appeal brief, Applicants submit that *Li* in view of *Crisan* does not render independent claim 30 obvious. Accordingly, Applicants respectfully request that the Board vacate the rejection of this claim and direct the Examiner to allow these claims.

CONCLUSION

The Examiner errs in finding that:

1. Claims 1-12, 15-28 and 35 are anticipated by *Li*; and
2. Claims 29-30 and 32-34 are unpatentable over *Li* in view of *Crisan*.

Withdrawal of the rejections and allowance of all claims is respectfully requested.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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